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6 Attorneys for PAX ASSIST INC.,  
7 GLOBAL BAGGAGE EXPEDITER,  
INC. and GLOBAL AIRCRAFT  
DISPATCH, INC.

12 MARIO C. ZAPATA, an individual,  
13 Plaintiff,  
14 vs.  
15 DELTA AIR LINES, a corporation;  
16 GLOBAL BAGGAGE EXPEDITER,  
17 a corporation; GLOBAL AIRCRAFT  
DISPATCH, a corporation; PAX  
ASSIST, a corporation,  
18 Defendants.

**CASE NO. 2:22-cv-04584-MEMF-MRW**

**DECLARATION OF YATRICE  
FLEURIMOND IN SUPPORT OF  
DEFENDANTS' MOTION TO  
DISMISS PURSUANT TO FRCP  
12(b)(2),, FRCP 12(b)(3), AND FRCP  
12(b)(6), OR IN THE ALTERNATIVE,  
TO TRANSFER VENUE PURSUANT  
TO 28 U.S.C. §§ 1406(a) OR 1404(a)**

Honorable Maame Ewusi-Mensah Primpong  
First Street Courthouse,  
350 West 1st Street,  
Los Angeles, California 90012.

Date: Thursday, February 9, 2023  
Time: 10:00 a.m.  
Courtroom 8B

## DECLARATION OF PAX ASSIST

I, Yatrice Fleurimond, declare:

1. All the statements contained herein are made and based on my personal knowledge and if called as a witness I could and would testify competently thereto.

YATRICE FLERUIMOND DECL ISO DEFENDANTS' MOTION TO DISMISS OR IN THE  
ALTERNATIVE TO TRANSFER VENUE

1       2. I am the Vice President of PAX ASSIST, INC., defendant in the above  
2 captioned action.

3       3. I am familiar with Plaintiff's claims in the above captioned matter and  
4 have reviewed the Complaint filed in the action.

5       4. Defendant PAX ASSIST, INC. is a New York corporation.

6       5. Defendant PAX ASSIST, INC.'s principal place of business is in the  
7 State of New York.

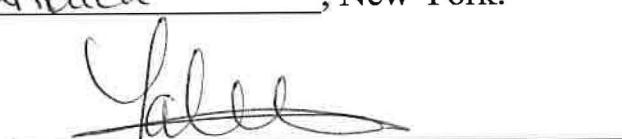
8       6. Defendant PAX ASSIST, INC. do not operate business, had any  
9 offices, and engage in intentional conduct expressly aimed in California.

10       7. Defendant PAX ASSIST, INC. has not and does not transact business  
11 in the Central District of California, meaning that none of the services are offered at  
12 any location other than in the State of New York.

13

14       I declare under penalty of perjury under the laws of the United States of  
15 America that the foregoing is true and correct and that this declaration is executed  
16 on November 29, 2022, at Tamauca, New York.

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Yatrice Fleurimond

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## FEDERAL COURT PROOF OF SERVICE

## Zapata v. Delta Airlines, et al.

USDC – Central Case No. 2:22-CV-04584-MEMF-MRW

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to the action. My business address is 633 West 5th Street, Suite 4000, Los Angeles, CA 90071. I am employed in the office of a member of the bar of this Court at whose direction the service was made.

On December 2, 2022, I served the following document(s): **DECLARATION OF YATRICE FLEURIMOND IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS**

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

9 Mario C. Zapata  
17922 San Fernando Mission Blvd.,  
10 Room 110B  
11 Granada Hills, CA 91344  
Email: [mczapata711@gmail.com](mailto:mczapata711@gmail.com)  
Tel: 917-270-4405

The documents were served by the following means:

(BY COURT'S CM/ECF SYSTEM) Pursuant to Local Rule, I electronically filed the documents with the Clerk of the Court using the CM/ECF system, which sent notification of that filing to the persons listed above.

16 I declare under penalty of perjury under the laws of the United States of America and the  
State of California that the foregoing is true and correct.

Executed on December 2, 2022, at Los Angeles, California.

/s/ Jong Won Yang

Jong Won Yang